



EFC Wealth Management Firm, LLC

EFC Client Privacy Policy Notice

Privacy Policy – Client Disclosure Notice

Your relationship with EFC Wealth Management Firm, LLC (“EFC”) is based on trust and confidence. To fulfill its responsibilities to you, EFC requires that you provide current and accurate financial and personal information. You deserve to expect that EFC will protect the information you have provided in a manner that is safe, secure, and professional. EFC and its employees are committed to protecting your privacy and to safeguarding that information.

Personal Information We Collect and How We Collect It

In providing you wealth management services, we collect certain nonpublic personal information (“PII”) about you. PII includes information such as your name, address, phone number, ZIP code, email address, age, income, assets, employment, and similar information.

Our policy is to keep this information strictly confidential, and to use or disclose it only as needed to provide services to you, or as permitted by law. Our privacy policy applies equally to our former clients, as well as individuals who simply inquire about the services we offer.

The nonpublic personal information we have about you includes what you give us when you open an account, or communicate with us about your account, such as your name, address, social security number, employment information, investment objectives, financial circumstances, account transactions and holdings.

You can call us for general information anonymously or visit us on the internet without telling us who you are or revealing any information about yourself, including your name and email address.

There are times when we may ask you for information about yourself to assist us in meeting your various needs. In these cases, you and your browsing will no longer be anonymous to us. To provide these services, we may need to ask you directly to provide, among other things, your name, physical address, zip code, email address, phone number, and other personal information.

Please note that we do not knowingly solicit information from minors, and we do not knowingly market our products or services to minors. We are required to conduct due diligence on all customers prior to providing our services.

We also collect non-public customer data in checklists, forms, in both written and electronic notations, and in documentation provided to us by our customers for evaluation, registration, licensing or related consulting services. We also create internal lists of such data.



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Sharing Non-Public Personal and Financial Information – How We Use It

When you provide information to us, we may share your information, to the extent provided by applicable law, with our affiliated companies and necessary third parties for the purpose of fulfilling your requests and servicing your account, as well as offering you additional services that may be beneficial to you. It is not shared with any third party, unless requested by you or permitted by law. Under no circumstance will we sell your information or transfer your information to any ad network, ad exchange, data broker or other advertising or monetization related service. We may also aggregate statistics that we gather about our customers, sales, traffic patterns and services, and provide these statistics to third parties; however, when we do, these statistics will not include any personal information that identifies individuals.

EFC may share your personal information only under the following circumstances:

- When necessary to complete a transaction in a customer account, such as with the clearing firm or account custodians;
- When required to maintain or service a customer account;
- To resolve customer disputes or inquiries;
- With persons acting in a fiduciary or representative capacity on behalf of the customer;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm;
- In connection with a sale or merger of EFC's business;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability;
- To comply with federal, state or local laws, rules and other applicable legal requirements;
- In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement;
- In any circumstances with the customer's written instruction or consent; or
- Pursuant to any other exceptions enumerated in the California Privacy Rights Act (CPRA) and as will be amended effective 1/1/2023 to the California Consumer Privacy Act (CCPA), and any other applicable state and federal privacy laws.

SMS text message consent, content, and phone numbers will not be shared with third parties.

Protection of Your Information

EFC is committed to the protection and privacy of its customers' and consumers' personal and financial information. During regular business hours, access to customer records is monitored so that only those with approved entitlements may access the files. During hours in which the company is not in operation, the customer records will be secured. No individual who is not so authorized shall obtain or seek to obtain personal and financial customer information. No individual with authorization to access personal and financial customer



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information shall share that information in any manner without the specific consent of a firm principal. Failure to observe EFC procedures regarding customer and consumer privacy will result in disciplinary action and may include termination.

We restrict access to nonpublic personal information about you to those persons who need to know it or who are permitted by law to receive it. We use a variety of security measures to protect against the access, loss, misuse, and alteration of information under our control by maintaining physical, electronic, and procedural safeguards to protect the confidentiality of your information.

Although we make good-faith efforts to maintain the security of such information, we cannot guarantee that it will remain free from unauthorized access, use, disclosure, or alteration or that our security measures will prevent unauthorized persons from accessing or obtaining this information. We assume no liability to you or any other party in relation to the unauthorized access, use or alteration of any information provided to us.

Notification in the Event of Data Breach

EFC has adopted an incident response program in the event of a potential data breach event. If your sensitive non-public information is breached by an unauthorized party, we will comply with applicable laws in notifying you of the breach as soon as possible, within 30 days of discovery. This includes critical third parties we do business with that may experience a breach affecting information about you that could be used to harm you.

Accessing or Correcting Your Information

You may access the data collected by us about you by sending a request to the address listed below. If you believe that an error has been made in the accuracy of the information collected from you, we will correct such error upon adequate verification of the error and the identity of the person seeking the correction.

Changes to this Privacy Policy

We reserve the right to modify or supplement this Privacy Policy statement at any time. If we make any material change, we will notify you directly. We will update our Privacy Policy Client Notice, our website's privacy policy, and our Form ADV Disclosure Brochure to include such changes. A notice that our privacy policy has been updated will be displayed on our website homepage. We ask that you periodically visit our website and this privacy policy to check for any changes.

If You Close Your Account

If you decide to close your account(s) and/or become an inactive customer, we will continue to adhere to the privacy policies and practices as described in this Policy. We reserve the right to change this Policy at any time and you will be notified if any material changes do occur.



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Opt-Out Provisions

It is a policy of EFC to not share non-public personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary to service customer accounts or is mandated by law, there are no allowances made for clients to “opt out”.

If you decide to close your account(s) or become an inactive customer, we will adhere to the privacy policies and practices as described in this notice. We reserve the right to change this policy at any time and you will be notified if any changes do occur.

If you have any questions after reading this Privacy Policy notice, please write to us at:

EFC Wealth Management Firm, LLC
Attn: Privacy Officer
5777 W. Century Blvd., Ste: 985
Los Angeles, CA 90045